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6 UNITED STATES DISTRICT COURT
7
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,
10

11 Plaintiff,

12 vs.

13 KINCADE, ROBERT, et al

14 Defendants.

CASE NO. 2:15-cr-00071-JAD-GWF

**MOTION TO EXTEND MOTIONS
DEADLINES**

15 IT IS HEREBY STIPULATED AND AGREED, by and between Kathleen Bliss, counsel
16 for Robert Devell Kincade; Jose Roglio Flores and his counsel, Paul Riddle with the Public
17 Defender's Office; and Alexandra Michael, Assistant United States Attorney allowing an
18 extension of the motions' deadline. A proposed order is submitted herewith.
19

20 This Stipulation is entered into for the following reasons:

- 21 1. Counsel for defendant, Robert Devell Kincade, was just recently retained on
22 September 1, 2015, and needs time to review all discovery.
23
24 2. Discovery for the case is ongoing and there are outstanding forensics that the
25 government has not provided.
26 3. Counsel for the government will soon be going on medical leave returning January
27 11, 2016.
28

1 4. The Order for the stipulation to continue trial (Dkt. 51) was signed on October 5,
2 2015, continuing calendar call to February 1, 2016, and the trial to February 9,
3 2016.

4 5. Counsel are requesting the new deadlines for the motions be set as follows:
5 dispositive motions due January 4, 2016; responses due January 18, 2016; and
6 replies due January 25, 2016.

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8 6. Since this stipulation affects the motions' and responsive deadlines only, and
9 Speedy Trial has been waived as to the trial date (Dkt. 51), there is no need for an
10 additional waiver.

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12 DATED this 6th day of October, 2015.

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15 By: /s/ Kathleen Bliss
16 KATHLEEN BLISS,
 Counsel for Robert Devell Kincade

 By: /s/ Alexandra Michael
 ALEXANDRA MICHAEL
 Assistant United States Attorney

17 By: /s/ Paul Riddle
18 PAUL RIDDLE
 Counsel for Jose Roglio Florez

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KINCADE, ROBERT, et al

Defendant.

CASE NO. 2:15-cr-00071-JAD-GWF

**MOTION TO EXTEND MOTIONS
DEADLINES**


FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for defendant, Robert Devell Kincade, was just recently retained on September 1, 2015, and needs time to review all discovery.
2. Discovery for the case is ongoing and there are outstanding forensics that the government has not provided.
3. Counsel for the government will soon be going on medical leave returning January 11, 2016.
4. The Order for the stipulation to continue trial (Dkt. 51) was signed on October 5, 2015, continuing calendar call to February 1, 2016, and the trial to February 9, 2016.
5. Counsel are requesting the new deadlines for the motions be set as follows: dispositive motions due January 4, 2016; responses due January 18, 2016; and replies due January 25, 2016.

ORDER

Dipositive motions due on January 4, 2016; Response to motions due on January 18, 2016; and Replies to responses due on January 25, 2016.


GEORGE FOLEY, JR.
United States Magistrate Judge